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6 ATTORNEYS FOR
7 Samuel Engineering, Inc.

8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 (San Francisco Division)

11 In re:)	Case No. 19-30088 (DM)
12 PG&E CORPORATION)	CHAPTER 11
13 -and-)	(Lead Case)(Jointly Administered)
14 PACIFIC GAS AND ELECTRIC)	SAMUEL ENGINEERING, INC.'S STATEMENT OF NON- OPPOSITION AND RESERVATION OF RIGHTS RE REORGANIZED DEBTORS' FIFTH OMNIBUS OBJECTION TO CLAIMS
15 COMPANY,)	
16 Debtors.)	
17)	
18 <input type="checkbox"/> Affects PG&E Corporation)	Date: September 22, 2020
19 <input type="checkbox"/> Affects Pacific Gas and Electric)	Time: 10:00 a.m.
20 Company X Affects both Debtors)	Place: (Telephone Appearance)
21 * All papers shall be filed in the Lead)	U.S. Bankruptcy Court
22 Case, No. 19-30088 (DM).)	450 Golden Gate Ave.
		Courtroom 17 th , 16 th Floor
		San Francisco, CA 94102

23 TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY
24 JUDGE, THE CLERK OF THE COURT, THE OFFICE OF THE UNITED STATES
25 TRUSTEE, THE DEBTORS AND THEIR COUNSEL OF RECORD, AND ALL PARTIES
26 IN INTEREST:

27 Samuel Engineering, Inc. ("Samuel Engineering") submits this statement of non-
28 opposition and reservation of rights in response to the Reorganized Debtors' Fifth Omnibus
29 Objection to Claims [Doc# 8759] ("5th Omnibus Objection"), and submits as follows:

Samuel Engineering does not object to disallowance of Samuel Engineering's Claim #

1 2576 in the amount of \$433,285.49 filed against PG&E Corporation on the sole ground that it was
2 filed in the “Wrong Case” and against the wrong Debtor, as set forth in the 5th Omnibus Objection,
3 based upon the Debtors’ representation that Samuel Engineering’s Claim # 2566 in the amount of
4 \$433,285.49 filed against Pacific Gas and Electric Company, referred to by the Debtors as the
5 “Surviving Claim,” is in no way impacted or affected by the 5th Omnibus Objection.
6

7 Samuel Engineering, while noting that the underlying debt to Samuel Engineering is
8 scheduled as liquidated and undisputed and is subject to, at least, post-petition interest as set forth in
9 the Plan, expressly reserves any and all rights with respect to Claim # 2566, as well as any other
10 claim that Samuel Engineering has filed in these cases that is not referenced in the 5th Omnibus
11 Objection.
12

13 Dated: September 7, 2020

LAW OFFICE OF WILLIAM J. HEALY
/s/ William J. Healy

William J. Healy